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20 UNITED STATES DISTRICT COURT

21 NORTHERN DISTRICT OF CALIFORNIA

22 OAKLAND DIVISION

23 UNITED STATES OF AMERICA,

CASE NO. CR-15-0320-HSG

24 Plaintiff,

25 v.

STIPULATION TO EXCLUDE TIME
UNDER THE SPEEDY TRIAL ACT

26 LYNSEY HARTSINCK, AND
SANTIAGO REYNA,

27 Defendants.

STIPULATION

The parties hereby STIPULATE and AGREE as follows:

Defendant Lynsey Hartsinck made her initial appearance in this matter on June 24, 2015, and was arraigned on that date. Defendant Santiago Reyna made his initial appearance in this matter on July 2, 2015, and was arraigned on July 8, 2015.

Counsel for the United States provided counsel for Defendants with an initial production of discovery on July 16, 2015. The parties appeared before District Judge Gilliam for the first time on August 10, 2015.

On August 13, 2015, the United States produced approximately 3,200 pages of documents, as well as native files. On September 29, 2015, attorneys for both defendants participated in an evidence review at IRS offices in Walnut Creek, California. On October 9 and 15, 2015, the United States produced additional files and videos from a seized mobile phone, as well as audio files and color photographs.

On January 11, 2016, the parties appeared before the Court for a status conference. The United States anticipates making an additional production of discovery, to include additional memorandums of interview. The Court has scheduled the next status conference for Monday, March 14, 2016.

Accordingly, the United States and Defendants Lynsey Hartsinck and Santiago Reyna, hereby STIPULATE AND AGREE that time under the Speedy Trial Act be excluded from January 11, 2016 to March 14, 2016, pursuant to 18 U.S.C. §§ 3161(h)(7)(A) and (b)(iv) to allow for effective preparation of defense counsel, taking into account the exercise of due diligence.

Respectfully submitted this 14th day of January, 2016.

DATED: January 14, 2016.

/s/ Colin Sampson
COLIN SAMPSON
Counsel for the United States of America

DATED: January 14, 2016.

/s/ Angela M. Hansen
ANGELA M. HANSEN
Counsel for Defendant Lynsey Hartsinck

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1 DATED: January 14, 2016.

/s/ Adam Pennella
ADAM PENNELLA
Counsel for Defendant Santiago Reyna

6 **ORDER**

7 In light of the stipulation and agreement of the parties to this action, and good cause appearing
8 therefor, it is HEREBY ORDERED that time under the Speedy Trial Act be excluded from January 11,
9 2016, to March 14, 2016 pursuant to 18 U.S.C. §§ 3161(h)(7)(A) and (b)(iv) to allow for effective
10 preparation of defense counsel, taking into account the exercise of due diligence. Pursuant to 18 U.S.C.
11 §§ 3161(h)(7)(A) and (B)(iv), the Court finds that the ends of justice served by excluding the period of
12 time between January 11, 2016 and March 14, 2016, outweigh the best interest of the public and of the
13 defendants in a speedy trial.

14
15 DATED: January 15, 2016


HAYWOOD S. GILLIAM, JR.
UNITED STATES DISTRICT JUDGE